

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

KURTIS C. WATKINS, Mo.
DOC#1192492,
Petitioner,

vs.

KELLY MORRISS, Warden of the
Jefferson City Correctional Center,
Respondent.

Case No. 4:25-CV-00015-RHH

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE REPLIES
IN SUPPORT OF HABEAS PETITION AND REQUEST FOR DISCOVERY**

Petitioner Kurtis C. Watkins moves the Court for an extension of time of four days in which to file his replies in support of his petition for a writ of habeas corpus (Doc. 4) and his motion for leave to conduct discovery (Doc. 6), as to the responses the respondent filed on April 28, 2025 (Doc. 14; Doc. 15). The replies currently are due Friday, June 27, 2025.

This is Mr. Watkins' first request for an extension of time. If the Court grants this request, the replies will be due Tuesday, July 1, 2025. Undersigned counsel has conferred with counsel for the respondent, who states that the respondent consents to this request.

This Court entered a scheduling order making the respondent's response to Mr. Watkins' petition due April 24, 2025, with Mr. Watkins' reply due 60 days later (Doc. 4). With Mr. Watkins' consent, the Court extended the deadline for both that and the response to Mr. Watkins' motion for discovery April 28, 2025, allowing Mr. Watkins 60 days from then to file his reply (Doc. 13). The respondent filed those responses April 28 (Doc. 14; Doc. 15). 60 days from then is Friday, June 27, 2025.

In the time since the respondent's responses were filed, in addition to other duties undersigned counsel – who is representing Mr. Watkins *pro bono publico* – has filed appellate briefs in the U.S. Courts of Appeals for both the Eighth Circuit (*Lozano v. United States*, No. 24-3517; *Aaron v. Nat'l Passenger Rail Corp.*, No. 24-2654) and the Federal Circuit (*Ryno v. Dep't of the Army*, No. 24-1758), the Missouri Court of Appeals (*State v. Lundstrom*, No. SD38528; *Hazziez v. City of Kan. City*, No. WD87219; *Techtow v. Techtow*, No. WD87315; *State v. Pulse*, No. WD87238), and the Kansas Court of Appeals (*State v. Bee*, No. 128336; *Betts v. Keenan*, No. 128345; *Flores v. State*, No. 128055), as well as a petition for a writ of certiorari in the U.S. Supreme Court (*Bu v. Missouri*, No. 24-1235) and two applications for transfer in the Supreme Court of Missouri (*Smith v. Martinez*, No. SC101121; *In re M. R.-W.*, No. SC101142), and presented three oral arguments before the Missouri Court of Appeals (*Campbell v. Campbell*, No. WD87402; *Briscoe v. Judah*, No. WD87182; *McKenna v. McKenna*, No. WD87213) and one before the Florida Fifth District Court of Appeal (*Lewis v. Norfolk S. Ry. Co.*, No. 5D2024-1567). And besides Mr. Watkins' reply in this case, counsel also is working on other appellate briefs due in the U.S. Court of Appeals for the Tenth Circuit, the Missouri Court of Appeals, and the Kansas Court of Appeals. As well, counsel was out of the country on a long-planned family trip for ten days from June 14-24.

Undersigned counsel has diligently been working on Mr. Watkins' replies in support of his habeas petition and his request for discovery, which are nearly complete. Undersigned counsel was hopeful that he could complete and file them by the present deadline of June 27 after returning from his trip abroad, but due to his counsel's time constraints and catching up, Mr. Watkins needs four more days to

make certain that the issues in this case are fully replied to and presented to the Court as well as possible. The requested short extension is made in good faith and is not designed to vex or harass the respondent. No party's substantive rights will be adversely affected by this short extension.

Accordingly, the Court should extend the time in which to file Mr. Watkins' replies in support of his petition and his request for discovery until Tuesday, July 1, 2025.

Respectfully submitted,

Jonathan Sternberg, Attorney, P.C.

by /s/Jonathan Sternberg

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COUNSEL FOR PETITIONER
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Certificate of Service

I certify that I electronically filed a true and accurate PDF copy of the foregoing using the CM/ECF system on June 26, 2025. All counsel of record should receive service by operation of the CM/ECF system.

/s/Jonathan Sternberg
Attorney